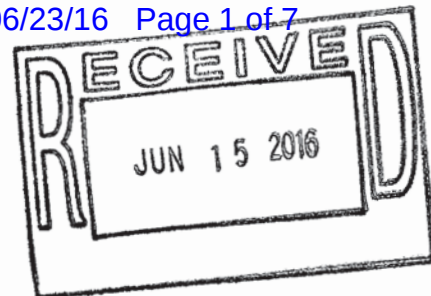


TJS
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

DARRELL LAW



(In the space above enter the full name(s) of the plaintiff(s).)

16 3028

- against -

DELAWARE COUNTY, PENNSYLVANIA;
DE COUNTY DISTRICT ATT. JACK WHELAN;
DE COUNTY SHERIFFS DEPT.; CLERK OF
COURTS IN DISTRICT COURT OF LIMA,
PENNSYLVANIA; MICHAEL LANGDALE,
DETECTIVE AND, THE COMMUNITY
EDUCATION CENTER INCORPORATED
AND MEDIA, PA STATE POLICE DETECTIVE
JOHN E. HANOSK

COMPLAINT

under the
 Civil Rights Act, 42 U.S.C. § 1983
 (Prisoner Complaint)

Jury Trial: ☒ Yes ☐ No
 (check one)

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

I. Parties in this complaint:

- A. List your name, identification number, and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff Name DARRELL LAW
 ID # 16002026
 Current Institution GEORGE W. HILL CORRECTIONAL FACILITY
 Address P.O. BOX 23A; 500 CHENEY ROAD
THORNTON, PA 19733

BETWEEN May 10, 2015 AND JUNE 30, 2015 IN DE COUNTY, PA.

What
happened
to you?

D. Facts: DETENTION WAS ILLEGAL BECAUSE THE PROBABLE CAUSE DETERMINATION WAS UNNECESSARILY DELAYED... IN ADDITION, DELAY MAYBE ATTRIBUTED TOWARDS MEDIA STATE POLICE DETECTIVE JOHN F. HANUSEK'S RELIANCE UPON UNTRUTHFUL AND UNRELIABLE INFORMATION PROVIDED BY UPPER PROVIDENCE TWP. DETECTIVE MICHAEL LANGDALE.

Who
did
what?

ASIDE FROM THE GOVERNMENT MISCONDUCT AS DESCRIBED ABOVE AND OF WHICH OCCURRED AT A PRELIMINARY EXAMINATION ON JUNE 30, 2015; DE COUNTY OFFICIALS (SHERIFFS DEPT., CONSTABLES OFFICE, DE COUNTY PRISON, DIST. ATT. OFFICE, ETC.) FAILED TO TRANSPORT PLAINTIFF TO COURT WITHIN A TIMELY MANNER SO THAT LIKELIHOOD OF CRIMINAL ACT MAYBE DETERMINED.

Was
anyone
else
involved?

DISTRICT COURT CLERK'S OFFICE AT MEDIA, PA, PERHAPS, MAY HAVE FAILED TO SCHEDULE AND/OR SEND NOTICE TO AGENCIES RESPONSIBLE FOR TRANSPORTATION, ETC..

Who else
saw what
happened?

COURT APPOINTED LAWYER, D. WESLEY CORNISH REPRESENTED PLAINTIFF...

III. Injuries:

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received.

MENTAL ANGUISH AND POST TRAUMATIC STRESS; REVIEW FOR TREATMENT STILL PENDING WITHIN FACILITY.

IV. Exhaustion of Administrative Remedies:

The Prison Litigation Reform Act ("PLRA"), 42 U.S.C. § 1997e(a), requires that "[n]o action shall be brought with respect to prison conditions under section 1983 of this title, or any other Federal law, by a

prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted." Administrative remedies are also known as grievance procedures.

- A. Did your claim(s) arise while you were confined in a jail, prison, or other correctional facility?

Yes ☒ No ☐

If YES, name the jail, prison, or other correctional facility where you were confined at the time of the events giving rise to your claim(s).

GEORGE W. HILL CORRECTIONAL FACILITY

- B. Does the jail, prison or other correctional facility where your claim(s) arose have a grievance procedure?

Yes ☒ No ☐ Do Not Know ☐

- C. Does the grievance procedure at the jail, prison or other correctional facility where your claim(s) arose cover some or all of your claim(s)?

Yes ☐ No ☐ Do Not Know ☒

If YES, which claim(s)? _____

- D. Did you file a grievance in the jail, prison, or other correctional facility where your claim(s) arose?

Yes ☒ No ☐

If NO, did you file a grievance about the events described in this complaint at any other jail, prison, or other correctional facility?

Yes ☐ No ☐

- E. If you did file a grievance, about the events described in this complaint, where did you file the grievance?

1. Which claim(s) in this complaint did you grieve? NOT BEING TAKEN BEFORE A JUDGE FOR A PROBABLE CAUSE DETERMINATION

2. What was the result, if any? NO RESPONSE

3. What steps, if any, did you take to appeal that decision? Describe all efforts to appeal to the highest level of the grievance process. _____

F. If you did not file a grievance:

1. If there are any reasons why you did not file a grievance, state them here: _____

2. If you did not file a grievance but informed any officials of your claim, state who you informed, when and how, and their response, if any: _____

G. Please set forth any additional information that is relevant to the exhaustion of your administrative remedies. FILED FOR WRIT OF HABEAS CORPUS IN COMMON PLEAS COURT see CP-23-MD-1448-2015

ALSO, FILED MOTION TO QUASH INFORMATION/HABEAS CORPUS IN COMMON PLEAS COURT ON SEPTEMBER 21, 2015 see CP-23-CR-3930-2015
see also, D.LAW v. C.F.C. INC. et al # 2:16-CV-765-TJS

Note: You may attach as exhibits to this complaint any documents related to the exhaustion of your administrative remedies.

V. **Relief:**

State what you want the Court to do for you (including the amount of monetary compensation, if any, that you are seeking and the basis for such amount). MONETARY AWARD OF \$1,000.00 FOR EVERYDAY OF CONFINEMENT SPENT WITHOUT PROBABLE CAUSE DETERMINATION AND ADDITIONAL, \$1,000.00 FOR EVERYDAY OF

CONFINEMENT AS A RESULT OF MICHAEL LANSDALE'S UNTRUTHFUL STATEMENTS RELIED UPON BY JOHN E. HANUSEK AND/OR OF WHICH MAY HAVE HAD BEARINGS UPON THE PROBABLE CAUSE DETERMINATION, THEREBY, ADVERSELY EFFECTING PLAINTIFFS DUE PROCESS RIGHTS AND LIBERTY INTEREST.

ALSO, BEAR FINANCIAL RESPONSIBILITIES FOR TREATMENT AND/OR SERVICES REGARDING THE RELATED MENTAL HEALTH ISSUES THAT OCCURED FROM AFORESTATED CIVIL RIGHTS VIOLATION/S.

INVESTIGATE AND REPORT PROBABILITY OF RACIAL DISPARITY AND OR BIAS THAT MAYBE EFFECTING DAY TO DAY OPERATIONS, ADMIN. AND JUDICIAL, WITHIN DISTRICT COURTS OF DE. COUNTY, PA.

SIMILAR INQUIRY SHOULD APPLY WITHIN COURT OF COMMON PLEAS AT DE. COUNTY, PA.

REVIEW AND AMEND POLICIES THAT EFFECT AND DESIGN TO FOSTER OR CREATE A DRAWN OUT (AND ILLEGAL) PROCEDURE CAUSING DIS-COURSE AND/OR MANIPULATE THE CRIMINAL PROCESS.

INSTALL PROGRAM STATEMENT / POLICIES REQUIRING D.A.'S OFFICE, DE. COUNTY PRISON, ETC. INTENDED TO UPHOLD CONSTITUTION / FAIR PROCESS.

VI. Previous lawsuits:

- A. Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action?

Yes ___ No ☒

- B. If your answer to A is YES, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another sheet of paper, using the same format.)

1. Parties to the previous lawsuit:

Plaintiff _____

Defendants _____

2. Court (if federal court, name the district; if state court, name the county) _____

3. Docket or Index number _____

On
these
claims

4. Name of Judge assigned to your case _____
5. Approximate date of filing lawsuit _____
6. Is the case still pending? Yes ____ No ____
If NO, give the approximate date of disposition _____
7. What was the result of the case? (For example: Was the case dismissed? Was there judgment in your favor? Was the case appealed?) _____

On
other
claims

C. Have you filed other lawsuits in state or federal court?

Yes ____ No ☒

D. If your answer to C is YES, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same format.)

1. Parties to the previous lawsuit:

Plaintiff _____

Defendants _____

2. Court (if federal court, name the district; if state court, name the county) _____

3. Docket or Index number _____

4. Name of Judge assigned to your case _____

5. Approximate date of filing lawsuit _____

6. Is the case still pending? Yes ____ No ____

If NO, give the approximate date of disposition _____

7. What was the result of the case? (For example: Was the case dismissed? Was there judgment in your favor? Was the case appealed?) _____

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 10 day of JUNE, 20 16.

Signature of Plaintiff

Danell Law

Inmate Number

16002026

Institution Address C.W.H.C.F.
P.O. BOX 23A
500 CHENEY RD.
THORNTON, PA 19373

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint and provide their inmate numbers and addresses.

I declare under penalty of perjury that on this 10 day of JUNE, 2016, I am delivering this complaint to prison authorities to be mailed to the Clerk's Office of the United States District Court for the Eastern District of Pennsylvania.

Signature of Plaintiff: Darell Lewis